

## REMARKS

Claims 1-30 are pending in the application. Claims 1, 8, 11, 13, 17, 18, 21, 24-26 and 27 have been amended. No new matter has been added. Applicants respectfully request reconsideration of the rejections set forth in the Office Action dated April 15, 2005 in light of the preceding amendments and the following remarks.

Applicants thank the Examiner for the courtesy extended during the personal interview with Applicants' representative on May 25, 2005. During this interview, the difference between the invention and the cited reference was discussed.

The claims have been amended to clarify the present invention. No new matter has been added. Claim 1, for example, has been amended and now recites "creating a reference window that includes a set of reference window sub-regions, where the reference sub-region is the upper left reference window sub-region in the reference window", "wherein a time that the reference sub-region and reference window is stored in the on-chip memory before performing motion compensation using the set of motion vectors comprises an estimated time to reconstruct one macroblock" and "performing motion compensation on the video data in raster order". Support for this amendment can be found throughout the Specification, and in particular from paragraph 59 to paragraph 76, with respect to FIGs. 5-6, and paragraphs 67-69, for example. Claim 17 has been amended and now recites "creating a reference window that includes the set of reference window sub-regions identified by the motion information, where the reference window includes more reference sub-regions than a number of reference sub-regions identified by the motion information". Support for this amendment can be found in the Specification from paragraph 59 to paragraph 76, with respect to FIGs. 5-6, and paragraphs 69-72, for example.

### Rejections Under 35 U.S.C. §102(b)

Claims 1-29 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,978,509 to Nachtergaele et al. ("Nachtergaele").

Claim 1 has been amended and now recites "creating a reference window that includes a set of reference window sub-regions, where the reference sub-region is the upper left reference

window sub-region in the reference window”, “wherein a time that the reference sub-region and reference window is stored in the on-chip memory before performing motion compensation using the set of motion vectors comprises an estimated time to reconstruct one macroblock” and “performing motion compensation on the video data in raster order”. It is respectfully submitted that the prior art does not teach or suggest such an arrangement of limitations in the context of the claimed invention. For example, Nachtergaele does not mention time and does not teach or suggest “where the reference sub-region is the upper left reference window sub-region in the reference window”. Independent claims 21, 24 and 27 include similar limitations.

Claim 17 has been amended and now recites “creating a reference window that includes the set of reference window sub-regions identified by the motion information, where the reference window includes more reference sub-regions than a number of reference sub-regions identified by the motion information”, and “wherein a time that the reference sub-region and reference window is stored in the on-chip memory before performing motion compensation using the set of motion vectors comprises an estimated time to reconstruct one macroblock”. Nachtergaele is concerned with power consumption (see Abstract and 4:35 to 4:48). He models power dissipation from 14:47 to 15:6 and notes that increasing number of columns and rows increases power consumption. Thus, he teaches against storing reference sub-regions in a reference window that “includes more reference sub-regions than a number of reference sub-regions identified by the motion information”, as recited, since this would add more power according to his calculations.

For at least these reasons, independent claims 1, 17, 21, 24 and 27 are allowable. Therefore, Applicants respectfully submit that Nachtergaele does not teach or suggest amended independent claims 1, 17, 21, 24 and 27 and that the independent claims are patentable.

Dependent claims 2-16, 18-20, 22-23, 25-26 and 28-30 each depend directly from independent claims 1, 17, 21, 24 and 27 and are therefore respectfully submitted to be patentable over Nachtergaele for at least the reasons set forth above with respect to the independent claims. Further, the dependent claims recite additional elements which when taken in the context of the claimed invention further patentably distinguish the art of record.

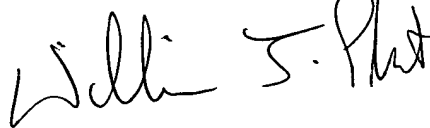
Withdrawal of the rejection under 35 USC §102(b) is therefore respectfully requested.

Applicants believe that all pending claims are allowable and respectfully requests a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Applicants hereby petition for an extension of time which may be required to maintain the pendency of this case, and any required fee for such extension or any further fee required in connection with the filing of this Response is to be charged to Deposit Account No. 50-0388 (Order No. CISC229).

Respectfully submitted,

BEYER WEAVER & THOMAS, LLP

A handwritten signature in black ink, appearing to read "William J. Plut". The signature is fluid and cursive, with the first name "William" and last name "Plut" clearly distinguishable.

William J. Plut

Limited Recognition under 37 C.F.R. § 10.9(b)

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